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1. Purpose

To outline the Privacy policy.

2. Scope

To outline the policy to all persons who deal with Hop Products Australia.

3. Introduction

Hop Products Australia will be referred to as “we”, “our”, “us” or “HPA” in this policy.

At HPA, privacy is important to us. We make every effort to maintain the highest standards in dealing with personal information of all people that we deal with (including employees and people external to the organisation referred to in this document as “you” or “your”) in accordance with the Privacy Act 1998 (Cth) (“the Law”).

This Privacy Policy sets out how HPA collects, uses, discloses, manages and protects personal information about you. It also explains how to contact us if you have any questions about the management of your personal information or would like to access the personal information we hold about you.

HPA may change this Privacy Policy from time to time where there is a change to the Law or a significant change to our organisation that impacts this Policy.

This Privacy Policy was last updated on 15 January 2020.

4. What information we collect and hold

4.1. Your information

We may collect and hold personal information about you, that is, information that can identify you, and is relevant to liaising with you, or to providing funding or services to you or others.

This information may include your name, date of birth, current and previous address details, telephone numbers, email addresses, demographic information, occupation and employment details, including qualifications.

We also collect information about:

- Suppliers, customers and our and their employees (including business name and address, contact details, and employee names, birthdates, addresses and working conditions (including hours and salaries); and
- Potential employees (including names, addresses, contact details, employment and academic histories and the names of their referees).

We only collect Sensitive Information (as defined by the Law) in very specific circumstances. Where we do so, we will notify you of this and ask for your specific consent for its collection, use and disclosure with strict controls around this.

4.2. Collection of information that is not ‘personal information’

We also collect information about your interaction with our website, activities and events without identifying you as an individual. Please refer to in part 13 below for further details.

5. How we collect and hold information

Personal information will generally be collected directly from you through the use of any of our standard forms, in a customer or supplier contract, over the internet, via our website, email, or through a telephone conversation with you.

6. Why we collect information

The personal information that we collect and hold about you, depends on your interaction with us.

Generally, we will collect, use and hold your personal information for the purposes of:

- a) Providing products to you or someone else;
- b) Providing you with information about other products that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- c) Facilitating our internal business operations (including managing your employment, if relevant);
- d) Complying with regulatory or legal requirements;
- e) Analysing our goods and customer needs with a view to developing new or improved services

7. What we do with the information we collect

HPA does not sell, or otherwise trade, your personal information. Generally, we only use or disclose personal information about you for the purposes for which it was collected (as above).

We use your personal information to carry out our interaction with you, including understanding your needs and providing better products. In particular, we use your personal information and you consent to us using your personal information:

- For internal record keeping;
- To improve our products;
- For promotion and direct marketing to you of our products;
- For internal product/service analysis (market research);
- To comply with the Law and protect against fraudulent activity;
- To conduct market research and analysis for the purpose of improving our offering;
- To conduct competitions or promotions for us;
- To verify your identity;
- To investigate any complaints made by you, or against you; or
- If we have reason to suspect that you have been engaged in any unlawful activity.

We also use your personal information to communicate with you, including by email, mail or telephone. If you have opted in to receive newsletters, communications or special offers from HPA you may, in some circumstances, also receive newsletters, communications or special offers from third party partners. If you do not wish to receive direct marketing communications please ask us to cease this via our Privacy Officer.

8. When we disclose your personal information

We may disclose personal information held about you to:

- Our related companies as required for carrying on our business;
- Third party service suppliers, including, but not limited to email systems providers and parties involved in the maintenance of our information technology systems;
- Our authorised representatives (including accounting, legal and financial advisers);
- Organisations required by law;
- Insurance providers in relation to specific claims;
- Law enforcement agencies; and
- Anyone to whom you authorise us to disclose the information

9. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access, disclosure, misuse, modification or loss of your personal information, we have in place suitable physical, electronic and managerial procedures to safeguard and secure the information.

Access to your personal information is limited to those parties within HPA who require legitimate access to it.

Because some of our back-ups are cloud based, your information may also be stored on computer servers located outside of Australia, in particular, Hong Kong, Japan, Malaysia, Singapore and Korea. You consent to the disclosure of your personal information to such overseas recipients and its location on overseas servers.

In special circumstances – for example, if we were to sell our business or part of it, or our shareholders sold our shares, your information may be transferred to third parties and their advisers as part of that sale. From time to time, we may provide aggregated and de-identified information to other organisation partners for various purposes.

If you receive communications purporting to be connected with us or our work that you believe have been sent to you other than in accordance with this Privacy Policy, or in breach of any law, please contact our Privacy Officer (contact details set out below). Our Privacy Officer will have your complaint reviewed and work with you to resolve it.

10. Access to and updating your personal information

You may request the details of any personal information we hold about you. We may charge you a small fee for providing you the information.

If you believe that any personal information we have is incorrect or incomplete, and you wish it to be corrected, please contact us as soon as possible and we will promptly correct it. On your request, and as far as it is practicable, we will provide your updated details to third party providers that we have previously disclosed your personal information to with your consent.

11. Notification of data breach

If we experience a data breach, for example, unauthorised access to, or disclosure of, your personal information, or where your personal information is lost in circumstances that could give rise to unauthorised loss or disclosure, and serious harm is likely to occur to you, and we have not been able to prevent it we will advise you and the Australian Information Commissioner as soon as reasonably practical of the breach, and work with you to resolve it or mitigate the circumstances of the breach.

12. GDPR (for individuals within the European Union)

The GDPR provides data protection and privacy rights to individuals within the European Union as set out below.

Under the GDPR such individuals (you) are granted the following rights:

- You have a right to know our identity. Please see 'Data Controller Details' at the end of this policy.
- You may withdraw any given consent at any time.
- You will be notified if, at any point in the future, the usage of your data changes from what is stated here. You will have the opportunity to withdraw consent.
- You have the right to object to any of your data being processed.
- You may request a copy of all information we have about you, at any time.
- You may request modification of any data we have on you, at any time.
- You may request deletion of any or all data we have on you, at any time

* For requests about your data, we will have to identify you to be able to comply.

Full details on your GDPR rights are provided at the following link:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

12.1. Data collection

Some personal data may be collected by us in the operation of our website. The amount of information collected depends on the level of interaction you have with us, such as signing up to the Support Centre or entering into competitions.

Data we collect may include the following:

- Identity data, such as name and email;
- Contact information, such as email and phone number;
- Financial and transactional data such as records of sales and purchases;
- Usage data, such as email opening rates, number of website logins, etc;
- Any other information you may volunteer to us, such as feedback or survey responses.

12.2. Cookies

We may use cookies on our website. You can set your browser to prevent this if you prefer. Cookies are stored in your browser, and may be deleted by you at any time.

12.3. Data usage

We will use your data for the following purposes:

- To verify your identity should you wish to exercise your rights as above;
- To provide information to you that you have requested;
- To send you marketing and promotion materials and offers;
- To generate anonymous aggregate data.

12.4. Recipients of data

Your data may be stored with third parties that provide services to us, such as our hosting provider and mailing list provider. Data may be available in some cases to contractors or associates that perform services for us, such as website development services.

12.5. Data retention

The period of data retention depends on the type of data, and the actions you take. We will retain data as long as is necessary to involve you in our work, or notify you of our events and activities, and may retain some information after your involvement with us ends. To have all information about you removed, please contact us, and we will comply as closely as allowed by law.

Please contact us (see details in Part 14 below) if any of the following apply to you:

- You want to know what data we have about you.
- You want us to modify or delete any data we have about you.
- You feel that your rights have not been met.
- You do not understand any part of this policy.
- You have unanswered questions about how we collect or use data.

12.6. Data breach

We will use best endeavours to report a personal data breach to the relevant supervisory authority within 72 hours of becoming aware of the breach, where feasible.

If the breach is likely to result in a high risk of adversely affecting your rights and freedoms, we will also inform you without undue delay.

Our Controller details are listed under Part 14 below.

13. Website

13.1. When you visit our website

When you visit our website www.hops.com.au, we will collect any personal information that you provide and we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, so that we can improve our service.

13.2. Cookies

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. By using our website you are assumed to consent to the use of cookies. In addition, cookies may be

used to serve relevant ads to website visitors through third party services such as Google AdWords. These ads may appear on this website or other websites you visit.

13.3. Third party sites

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that HPA is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

14. How to contact us

If you have any questions or concerns relating to our Privacy Policy or the way in which we deal with your personal information, please contact;

Chris Price
+61 408 326 052
chris.price@hops.com.au

15. Responsibilities of management and staff

All employees at all levels are responsible for adherence to this policy.

Management have a responsibility to:

- Monitor the working environment to ensure that acceptable standards are being observed.
- Behave in a manner consistent with the policy
- Promote adherence to the policy

16. Disciplinary action

Appropriate disciplinary action will be taken against a person who is found to have breached this policy. These measures will depend on the nature and circumstance of each breach.

The severity of the behaviour will determine which option HPA chooses to invoke.

Serious breaches of this policy that are considered to be 'serious misconduct', may result in employment being terminated summarily. This means that a person may not be given any warnings or a chance to correct behaviour.

Any employee or contractor who becomes aware of a breach of this Policy must disclose this breach either to the Managing Director or the Privacy Officer.

In extreme circumstances an individual may be concerned that a serious breach of this Policy has occurred but considers that it would be personally damaging to report it through normal channels, in such a case they should report it under the Speak Up (Whistleblowing) Policy.